

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Wilfredo Torres

Write the full name of each plaintiff.

19 CV 6332 (CM)

(Include case number if one has been assigned)

-against-

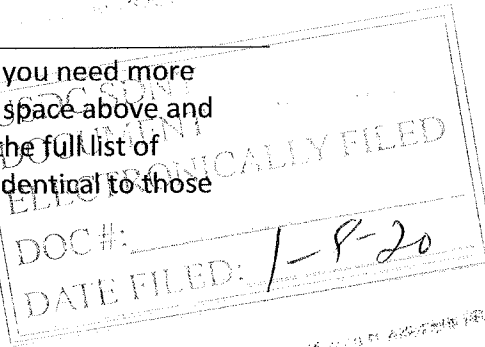
AMENDED
COMPLAINT

See attached list

Do you want a jury trial?

☒ Yes ☐ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.



NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ **Federal Question**

☐ **Diversity of Citizenship**

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

4th. amendment; due process of law; false arrest; false imprisonment;
malicious prosecution; kidnapping; torture.

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, _____, is a citizen of the State of
(Plaintiff's name)

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, See attached list, is a citizen of the State of
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or
subject of the foreign state of

If the defendant is a corporation:

The defendant, Health and Hospitals Corporation, is incorporated under the laws of
the State of New York

and has its principal place of business in the State of New York

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____.

If more than one defendant is named in the complaint, attach additional pages providing
information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional
pages if needed.

Wilfredo Torres

First Name

Middle Initial

Last Name

470 Second Avenue Apt. 2A

Street Address

New York, N.Y. 10016

County, City

State

Zip Code

212-447-1737

Telephone Number

Email Address (if available)

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: See attached list

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 2:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 3:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence: See attached statement

Date(s) of occurrence: See attached statement

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

See attached statement

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

Phychological and physical trauma; post-traumatic stess disorder; asthma exacerbation; spinal injury exacerbation, all of which require medical treatment up to the present.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

Thirty-million dollars (\$30,000,000.00); injuctive relief to stop future warrantless raids of my apartment by the defendants.

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

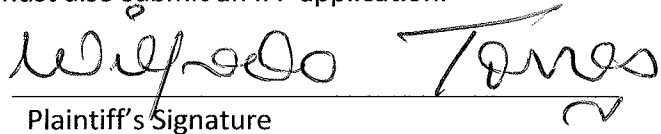
I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

January 8, 2020

Dated

Wilfredo Torres


Plaintiff's Signature

First Name

Middle Initial

Last Name

470 Second Avenue Apt. 2A

Street Address

New York, N.Y. 10016

County, City

State

Zip Code

212-447-1737

Telephone Number

Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☐ Yes ☒ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

DEFENDANTS' INFORMATION:

1---City of New York
Attn. Law Department
100 Church Street
New York, N.Y. 10010

2---Neil Veras, Police Officer
Place of Employment:
City of New York-Police Department
13th. Precinct, 230 East 21st. Street, New York, N.Y. 10010
Telephone: 212-477-7411

3---Patricia de Jesus, Police Officer
Place of Employment:
City of New York-Police Department
13th. Precinct, 230 East 21st Street, New York, N.Y. 10010
Telephone: 212-477-7411

4---John Doe, Police Officer #1
Place of Employment:
City of New York-Police Department
13th. Precinct, 230 East 21st. Street, New York, N.Y. 10010
Telephone: 212-477-7411

5---John Doe, Police Officer #2
Place of Employment:
City of New York-Police Department
13th. Precinct, 230 East 21st. Street, New York, N.Y. 10010
Telephone: 212-477-7411

6---Jane Doe, Police Officer #3
Place of Employment:
City of New York-Police Department
13th. Precinct, 230 East 21st. Street, New York, N.Y. 10010
Telephone: 212-477-7411

-2-

7---New York City Health and Hospitals
125 Worth Street
New York, N.Y. 10013
Telephone: 212-676-0932

8---New York City-Health and Hospitals
John Doe, MD #1
Bellevue Hospital Center
462 First Avenue
New York, N.Y. 10016
Telephone: 212-689-9600

STATEMENT OF CLAIM:

I am erroneously included in the terrorists list of the United States government, and as such am persecuted, tortured, incarcerated, and denied due process of law.

BACKGROUND INFORMATION:

1 ---The government of the United States openly accepts that the destruction of New York City's World Trade Center on September 11, 2001 was a Deep State job of controlled demolition intended to create a fake "war on terror"; multiply the military and national security budgets; trash the U.S. Constitution; activate the totalitarian Patriot Act-Foreign Intelligence Surveillance Act (FISA); a secret and omnipotent Court (FISC); militarize all police agencies to subjugate the civilian population; expand its hit-list of over 3-million targeted individuals; and take total control of the news-media. Exhibits 1,2,3,4,5

2---On 9-28-15 the Central Intelligence Agency-Federal Bureau of Investigation-New York City Police Department Unit ("CIA-FBI-NYPD Unit"), as part of its domestic assassinations program, with the help of landlord Bellevue South Associates' employee Zigo Drogalic ("BSA"), broke the door of my apartment in Manhattan, New York City, handcuffed me, and at gunpoint carried-out a warrantless raid.

--1 was not arrested or accused.

--they left a hand-written note with the word "intel", and the name of Department of Homeland Security Regional Director, Dennis McGowan, as the person that sent them.

--The perpetrators called the crime "a wellness check".

-2-

3---1 filed lawsuit 16CV2362 at the Southern District of New York federal Court, which was assigned to the Honorable Judge Ronnie Abrams, and the Honorable Magistrate Judge Kevin Nathaniel Fox.

4---The CIA-FBI-NYPD Unit returned on 4-28-16, and with assistance of BSA landlord-employee Elijah Smalls broke the door of my apartment; carried-out another warrantless raid; handcuffed, kidnapped, and took me as a John Doe in an ambulance followed by a police car with sirens blasting, to the psychiatric unit of HHC Bellevue Hospital ("HHC Bellevue Hospital"); assaulted and injected me with sleeping drugs; subjected me to numerous involuntary medical tests such as forcibly taking my urine and blood; and released me the next day as a John Doe with a fabricated diagnosis of delirium. Exhibit 6.

5---Known as "the Guantanamo of New York", HHC Bellevue Hospital is used as a detention and torture center for people accused of terrorism.

6---The perpetrators called the raid "a wellness-check".

7---When I returned home noticed that the CIA-FBI-NYPD Unit had searched my apartment, and the door had been replaced.

8---Up to this day it's not known who handcuffed and transported me to HHC Bellevue Hospital during the incident because the highest-ranking NYPD official at the scene of the kidnapping states in an affidavit:

-3-

"I DID NOT MAKE THE DECISION TO TRANSPORT THE PLAINTIFF TO THE HOSPITAL, NOR I INSTRUCT ANYONE TO DO SO; ANOTHER OFFICER PLACED HANDCUFFS ON THE PLAINTIFF".

9---The alleged member of the NYPD that placed handcuffs on me was identified as Kevin Walight, but a year and a half into the proceedings the lawyers of the City of New York mysteriously dropped him as defendant, erased him from the case, and refused to provide information of his whereabouts to be served.

10---My numerous attempts to locate and serve Kevin Walight have been ignored by the Court. Docket 197.

11---On 10-19-18, I asked Judge Abrams to include the FBI as defendant. Docket 316.

12---The following day, 10-20-18, the CIA-FBI-NYPD Unit fabricated against me a Family Court accusation for Aggravated Harassment using as complaining witness a mentally ill, heroin-addicted female who had a pending case for felony possession of ten (10) bags of heroin.

13---The accusation against me was later dismissed.

14---On 12-13-18, the CIA-FBI-NYPD Unit, Police Officers Neil Veras and Patricia de Jesus, and Elijah Smalls now representing new landlord The Blackstone Group, were denied access to my apartment and tried to break the door with a sledgehammer, while stating: "YOU PAID FOR THE DOOR AND WILL HAVE TO PAY AGAIN". Audio-video available.

15---On 12-21-18, the CIA-FBI-NYPD Unit, Police Officers Neil Veras and Patricia de Jesus, filed a false criminal case against me for Aggravated Harassment about the Family Court matter.

-4-

16--- I surrendered, was arrested by Police Officers Neil Veras and Patricia de Jesus, and released by a Judge the same day.

17---The CIA-FBI-NYPD Unit, Police Officers Neil Veras and Patricia de Jesus, signed and fabricated the accusation on 12-28-18.

18---The case was later dismissed.

19---On 2-10-19 the CIA-FBI-NYPD Unit, Police Officers Neil Veras, and Patricia de Jesus, accompanied by Blackstone employee Elijah Smalls, after being denied access to my apartment made threats such as:

"IF YOU DONT OPEN THE DOOR WE WILL TELL YOUR NEIGHBORS THAT YOU ARE A RAPIST AND A PEDOPHILE". Recorded.

20---On 2-27-19 an appointment had been arranged between Manhattan District Attorney, Cyrus Vance, and my Legal Aid Society lawyer, Jim Wu, for the complaining witness to retrieve property from my apartment, with the agreement the police would not be there, but the DA and Legal Aid lawyer set a trap for another warrantless raid of my apartment.

21---When the woman walked-in, at about 9:00AM, the CIA-FBI-NYPD Unit composed of Police Officers Neil Veras, Patricia de Jesus, John Doe #1, John Doe #2, and Jane Doe #3, without a warrant, invaded my apartment; handcuffed and arrested me on a false charge of violating an Order of Protection related to the same woman and the same case; searched the apartment; removed property; Police Officers John Doe #1, 2,nd 3 took me to the 13th. police precinct; removed my coat despite sub-freezing weather; handcuffed and with leg-

-5-

shackles took me to another involuntary psychiatric examination at defendant HHC Bellevue Hospital; returned me to the 13th. police precinct; took me to Court; returned me to the 13th. Police Precinct; returned me to Bellevue Hospital; returned to the 13th. police precinct; and to Court the next day where a Judge stopped the torture by releasing me.

WHILE I WAS TORTURED BY POLICE OFFICERS JOHN DOE #1, 2, AND 3, POLICE OFFICERS NEIL VERAS AND PATRICIA DE JESUS REMAINED SEARCHING AND RANSACKING MY APARTMENT. Exhibits 7, and 8.

22---While in my apartment committing this crime, Police Officers Neil Veras and Patricia de Jesus made jokes such as:

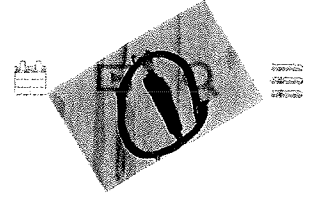
"WE SHOULD GIVE A GIFT CERTIFICATE FROM COSTCO TO REPLACE ALL THE JUNK IN THIS APARTMENT".

"TORRES FILES LAWSUITS AGAINST EVERYONE".

23---Soon thereafter the false criminal accusation was dismissed.

A handwritten signature in black ink that reads "Wilfredo Torres". The signature is written in a cursive, flowing style. The first name "Wilfredo" is written with a large, stylized 'W' and 'i'. The last name "Torres" is written with a large, stylized 'T' and 'r'. There is a small flourish or mark at the end of the signature.

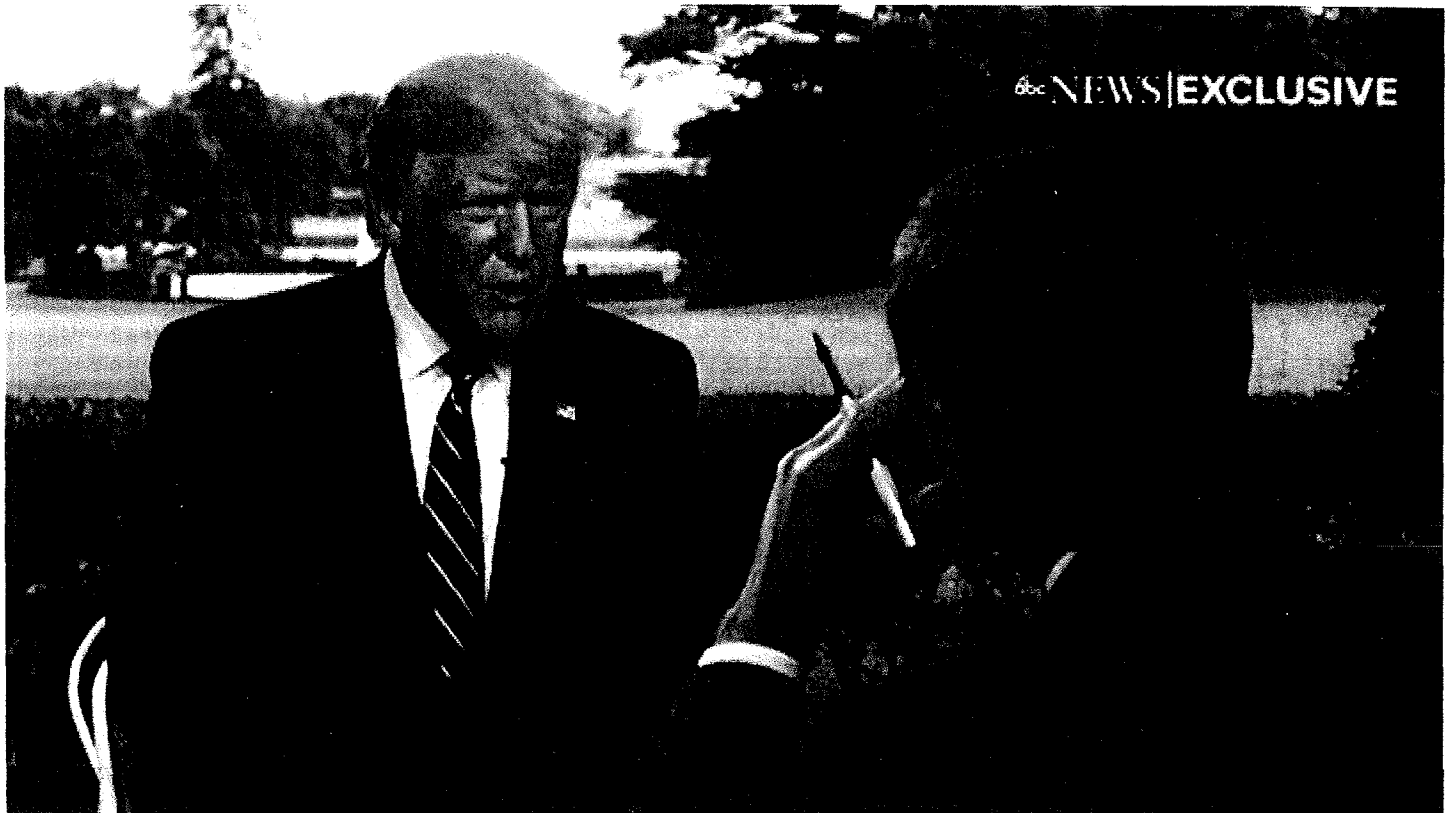
Wilfredo Torres
470 Second Avenue Apt. 2A
New York, N.Y. 10016



'It was not Iraq. It were other people', says Trump

Home / US / Politics

Mon Jun 17, 2019 03:25PM [Updated: Mon Jun 17, 2019 05:57PM]

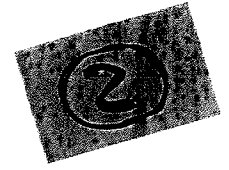


US President Donald Trump talked to ABC News' George Stephanopoulos on Sunday.

US President Donald Trump says he knows who was behind the September 11, 2001 terrorist attacks that left thousands of Americans dead.

In an exclusive interview with ABC News' George Stephanopoulos broadcast on Sunday, Trump categorically said that "Iraq did not knock down the World Trade Center."

3,000+



-(2)

Breakthrough: U.S. Attorney Agrees to Present Evidence of WTC Demolition to Federal Grand Jury

Finally, after 17 long years, the 9/11 Truth Movement has opened an avenue to prosecuting those responsible for the shocking destruction of the World Trade Center and the horrible loss of life that resulted.

In April 2018, the Lawyers' Committee for 9/11 Inquiry — together with more than a dozen 9/11 family members and with help from AE911Truth — filed a petition with the U.S. Attorney in Manhattan demanding that he present evidence of unprosecuted federal crimes at the World Trade Center to a special grand jury. Then, in November, came the big news: The U.S. Attorney notified the Lawyers' Committee (<https://www.ae911truth.org/images/PDFs/US-Attorney-Letter-110718.pdf>) in writing that he would comply with the provisions of 18 U.S.C. § 3332 requiring him to relay their report to a special grand jury.

Now the Lawyers' Committee and AE911Truth are working to ensure a *thorough and successful* grand jury investigation.



Terror Watch List Counter: A Million Plus ^[1]

Why are there so many names on the U.S. government's terrorist list?

In September 2007, the Inspector General of the Justice Department reported ^[2] that the Terrorist Screening Center (the FBI-administered organization that consolidates terrorist watch list information in the United States) had over 700,000 names in its database as of April 2007 - and that the list was growing by an average of over 20,000 records per month.¹ (See also this new March 2008 report ^[3].²)

By those numbers, the list now has over one million names on it. Terrorist watch lists must be tightly focused on true terrorists who pose a genuine threat. Bloated lists are bad because

- they ensnare many innocent travelers as suspected terrorists, and
- because they waste screeners' time and divert their energies ^[4] from looking for true terrorists.

Watch list main page ^[5]

Airline security page ^[6]

© 2019 ACLU

Source URL: <https://www.aclu.org/other/terror-watch-list-counter-million-plus#comment-o>

Links

[1] <https://www.aclu.org/other/terror-watch-list-counter-million-plus>

[2] <http://www.usdoj.gov/oig/reports/FBI/ao741/final.pdf>

[3] <http://www.usdoj.gov/oig/reports/plus/ao816/final.pdf>

[4] <https://www.aclu.org/privacy/gen/26535res20060824.html>

[5] <https://www.aclu.org/technology-and-liberty/watch-lists>

[6] <https://www.aclu.org/technology-and-liberty/airline-security>

DANIEL L. MEYERS
ATTORNEY-AT-LAW
350 BROADWAY, SUITE 308
NEW YORK, NY 10013
(212) 226-4106 (PHONE)
(212) 431-0107 (FAX)

May 23, 2006

Central Intelligence Agency
Information and Privacy Coordinator
Washington, D.C. 20505

Re: Freedom of Information Act Request
On behalf of Mr. Wilfredo Torres

Dear Information and Privacy Coordinator:

Your undersigned is the attorney for Mr. Wilfredo Torres, who has, in writing, authorized me to request on his behalf certain records and information from your agency as more fully described below. (Attached is the duly notarized authorization).

This letter constitutes a request pursuant to the Freedom of Information Act, 5 U.S.C. § 552 ("FOIA"), and the Privacy Act, 5 U.S.C. § 552a ("PA"). Similar requests have been submitted to the Transportation Security Organization ("TSA"), the Department of Justice ("DOJ"), the Department of Homeland Security ("DHS"), the Federal Bureau of Investigation ("FBI") and the National Security Agency ("NSA").

The following personal information is submitted to specifically identify the party in interest:

- Mr. Wilfredo Torres;
- 470 Second Avenue, Apt. 2A
New York, NY 10016;
- Date of birth, March 23, 1952;
- Place of birth, San Juan, Puerto Rico;
- Social Security number, 584-42-7541.

For many years, including 2006, Mr. Torres travels frequently between New York and Puerto Rico. His principle travel purpose is to visit with family. He has been designated wrongfully, by your agency and/or in concert with other governmental agencies and/or the airlines, as a person who poses or is suspected of posing "a threat to civil aviation." As a



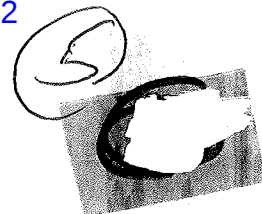
Tuesday, Feb 18, 2014 12:01 PM GMT

www.liveleak.com/c/PressTV

Home Video Reportages

Email

Print



"US Terrorism List Violates US Civil Liberties"

The Federal Bureau of Investigation, the national policing agency of the United States, admits to having compiled a "Terrorist Screening Database" with the names of persons suspected or alleged to be involved in terrorism.

The list contains the names of over a million people, who have been convicted of no crime and given no chance to defend themselves. One activity of the "Terrorism Screening Database" is the creation of the "No Fly List", which prevents thousands of people, including many US citizens, from boarding any aircraft. Once added to the list, things in their lives can become very difficult. Wilfredo Torres, suddenly found himself being subject to all kinds of harassment after he began protesting discrimination in travel policies. In one instance he was removed from a flight by airline officials. When Mr. Torres lawyer filed a request for information, the FBI revealed that it had collected over 100 pages of information about him. He now wants to have his name removed from the list. The FBI and other divisions of the US Department of Justice, have a long history of suppressing political dissidents over the last several decades. A law suit has been filed by the American Civil Liberties Union, in the hopes that courts will intervene, and halt the continued use of such lists.

Select 6 traits ▼

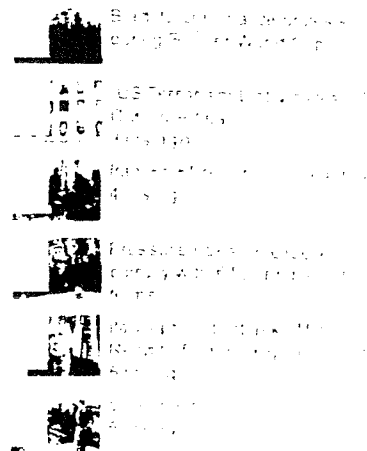
0

Caleb Maupin, Press TV New York

Caleb Maupin

Full Column

Latest From Video Reportages



See more Videos

Poll

Is the war against Syria's government a freedom-seeking battle, or a terrorist one?

- ☐ 1) It's a battle waged by freedom-seeking forces
- ☐ 2) It's a battle waged by foreign-backed terrorists



Today Last Week Last Month

Most Read Most Commented

Most Shared Most Watched



Related Stories

UN to evacuate MKO terrorists from Iraq

Support for Canada-US National Security Cooperation declines

Unknown-M,Dogwood, 54 y/o M, DOB 1/1/62
MRN 3727225, visit 3727225-1
Bellevue Hospital Center, medicine
Discharge Instruction Sheet
4/29/16 13:55



Last edit by White,LeRoy, RN on 4/29/16 14:00, complete.
(Patient Instructions)

IMPORTANT: Please bring this form to your first appointment with your doctor.

Physician Discharge Instructions by An,Nicholas, MD (Attending Hwang,John, MD) as of 4/29/16 01:29pm

Discharge Date: 4/29/16

Diagnoses:

The principle reason(s) for your hospitalization were: Delirium

Activity and Diet:

Home Care Ordered: no home care required

Activity: as tolerated

Home Diet: Regular

Your Medications Are:

Home Medication List

Discharge Medications

Smoking Status and Additional Information:

You are not a smoker.

Discharge Equipment Required: none,

No follow-up appointments necessary

